

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D. C.

In the Matter of )

Implementation of Section 25 )  
of the Cable Television Consumer )  
Protection and Competition Act )  
of 1992 )

Direct Broadcast Satellite )  
Public Service Obligations )

MM Docket No. 93-25

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FEDERAL COMMUNICATIONS COMMISSION

ACC has a long history of commitment to educational and informational programming. 1/ ACC noted to the Commission in 1988 that the nonprofit Foundation for Educational Advancement Today's ("FEAT") underwritten YES ("Your Educational Services") Networks were being formed to offer a wide variety of educational and informational services to institutions, homes and businesses. 2/ FEAT was organized as a 501(c)(3) public charity to develop the YES Networks. FEAT has been the recipient of seed grants from the U.S. Department of Education and the State of Arkansas, among others, to develop educational and informational services. As ACC has expressed previously to the Commission, ACC is committed to provide transponders to FEAT for the YES Networks. 3/ Thus, ACC has been and continues to be dedicated to increasing the educational and informational opportunities available to the nation.

#### COMMENTS

ACC generally agrees with the positions of other DBS permittees, such as DirecTv, Inc. ("DirecTv"), United States Satellite Broadcasting Company, Inc. ("USSB") and Continental

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1/ See ACC Application (January 12, 1984).

2/ See ACC Semi-Annual Status Report (April 18, 1988).

3/ See ACC Semi-Annual Status Report (March 2, 1989).

Satellite Corporation ("Continental"), that the public interest will best be served by maximizing provider flexibility.

Flexibility is particularly crucial in light of the fledging nature of the industry, which might be hampered in its efficient development if subject to rigid dictates.

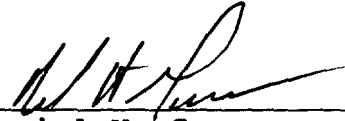
Thus, for example, ACC agrees with other service providers that the Commission should adopt no more than a 4 percent guideline for noncommercial programming, and should phase in this requirement, thereby effectuating the Act in a

Concerning the definition of "national educational programming supplier," as detailed by several commenters, Congress intended that term to encompass suppliers of informational as well as educational programming. See, e.g., Comments of National Association of Telecommunications Officers and Advisors et al. at 10-15. ~~ECette Commission edents~~

Respectfully submitted,

**ADVANCED COMMUNICATIONS  
CORPORATION**

By:

  
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July 14, 1993

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CERTIFICATE OF SERVICE

I, Daniel H. Garner, hereby certify that on this 14th day of July, 1993, caused to be placed in the United States mail, first class, postage prepaid, copies of the foregoing "REPLY COMMENTS OF ADVANCED COMMUNICATIONS CORPORATION"

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